STATE OF MAINE DEPARTMENT OF ENVIRONMENTAL PROTECTION





PATRICIA W. AHO COMMISSIONER

Corinth Pellets, LLC Penobscot County Corinth, Maine A-956-71-G-M (SM)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #3

FINDINGS OF FACT

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 Maine Revised Statutes Annotated (M.R.S.A.), §344 and §590, the Maine Department of Environmental Protection (Department) finds the following facts:

I. REGISTRATION

A. Introduction

Corinth Pellets, LLC (Corinth Pellets) was issued Air Emission License A-956-71-C-R on September 18, 2013 permitting the operation of emission sources associated with their wood pellet manufacturing facility. The license was subsequently amended on August 7, 2014 (A-956-71-E-A) and on December 3, 2014 (A-956-71-F-A).

Corinth Pellets has requested a minor revision to their license in order to extend the deadline to perform compliance stack testing.

The equipment addressed in this license is located at 74 Hob Road, Corinth, Maine.

B. Emission Equipment

The following equipment is addressed in this air emission license:

Fuel Burning Equipment

	Maximum Capacity	Maximum Firing Rate		Install.	
Equipment	(MMBtu/hr)	(ton/hr)	Fuel Type	Date	Stack #
Burner #1	45	4.2°	wood/biomass	2015	1

^c Based on firing wood with a moisture content of 40% by weight.

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Process Equipment

	Max Finished	Pollution Control	
Equipment	Material Process Rate	<u>Equipment</u>	Stack #
Dryer #1	18.0 ODT/hr ^b	Cyclone &	1
		Multiclone	

b Based on converting to a moisture content of 0% by weight and referred to as ovendryed tons per hour (ODT/hr)

C. Application Classification

This amendment will not increase licensed emissions of any pollutant. Therefore, this amendment is determined to be a minor revision and has been processed as such.

II. MINOR REVISION DESCRIPTION

The current air emission license for Corinth Pellets requires stack testing be performed within 180 days of startup of Burner #1 and Dryer #1 to demonstrate compliance with licensed emission limits. This equipment was started up in early January 2015.

The requirement to perform testing and the testing deadline were part of the Best Available Control Technology (BACT) analysis for the equipment and not a requirement of a New Source Performance Standard (NSPS) or National Emission Standard for Hazardous Air Pollutant (NESHAP).

Corinth Pellets has experienced numerous challenges through the startup process. The initial shakedown period has lasted longer than anticipated. Therefore, Corinth Pellets has requested an extension of the deadline to perform compliance stack testing until October 31, 2015. The Department approves the compliance stack testing deadline extension on Stack #1 for PM, PM₁₀, PM_{2.5}, NO_x, CO, and VOC. Stack testing shall occur no later than October 31, 2015.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that the emissions from this source:

- will receive Best Practical Treatment.
- will not violate applicable emission standards, and
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants Air Emission License A-956-71-G-M subject to the conditions found in Air Emission License A956-71-C-R, in amendments A-956-71-D-T, A-956-71-E-A, and A-956-71-F-A, and the following conditions.

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<u>Severability</u>. The invalidity or unenforceability of any provision, or part thereof, of this License shall not affect the remainder of the provision or any other provisions. This License shall be construed and enforced in all respects as if such invalid or unenforceable provision or part thereof had been omitted.

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The following shall replace Condition (28)(J)(1) of Air Emission License A-956-71-F-A:

(28) **Burner #1 and Dryer #1**

- J. Stack Testing
 - 1. No later than October 1, 2015, Corinth Pellets shall perform stack testing on Stack #1 for PM, PM₁₀, PM_{2.5}, NO_x, CO, and VOC to demonstrate compliance with the licensed emission limits using EPA stack test methods specified in the table below or other methods approved by the Department.

Pollutant	EPA Test Method	
PM	Method 5	
PM ₁₀	Method 201 or 201A and Method 202	
PM _{2.5}	Methods 201A and 202	
NO _x	Method 7E	
CO	Method 10	
VOC	Methods 25A	

[06-096 CMR 115, BACT]

DONE AND DATED IN AUGUSTA, MAINE THIS	2 DAY OF July , 2015.				
DEPARTMENT OF ENVIRONMENTAL PROTECTION					
BY: Marc Allen Poleet Core PATRICIA W. AHO, COMMISSIONER))				

The term of this amendment shall be concurrent with the term of Air Emission License A-956-71-C-R.

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: 6/30/15
Date of application acceptance: 6/30/15

Date filed with the Board of Environmental Protection:

This Order prepared by Lynn Muzzey, Bureau of Air Quality.

JUL 0 2 2015

State of Maine
Board of Environmental Protection